

THE MARLBOROUGH LAW FIRM, P.C.

445 Broad Hollow Road, Suite 400
Melville, New York 11747

(212) 991-8960
(212) 991-8952 fax
chris@marlboroughlawfirm.com

December 9, 2021

The Hon. Jessica S. Allen
United States Magistrate Judge
Martin Luther King Courthouse,
50 Walnut Street, Courtroom 2B
Newark New Jersey 07102

Re: *VALDEZ et al v. ZEKIROSKI, et al.*
2:20-cv-129-JSA

Dear Judge Allen:

This office represents Plaintiffs Larry Valdez, Edail Aliji, and Miguel Berrios in the above-referenced action. I write in connection with my December 1, 2021 letter concerning the stipulation of dismissal (the “Stipulation”) that the Court directed the parties to file at the settlement approval hearing on November 5, 2021 (D.E. 114).

By Order dated December 2, 2021, the Court directed counsel for Defendants Erhan Zekiroski and Zeki Electrical Management Services, Inc. (the “Eric Zeki Defendants”) to file a response to my letter by December 7, 2021 and scheduled a status conference via Zoom with the parties to discuss the matter on December 10, 2021 (D.E. 115, the “Order”).

In response to the Order, counsel for the Eric Zeki Defendants sent me a signed Stipulation on behalf of his clients, but did not file a letter with the Court pursuant to the Order. A copy of the executed Stipulation was filed on the docket on December 8, 2021 (D.E. 116).

The settlement agreement provides for payment to be made by Defendants Muzafer Zekiroski, Zeki Electric, Inc. and Z&Z Electric, Inc. (the “Mike Zeki Defendants”). The Mike Zeki Defendants confirmed via e-mail that payments would commence under the settlement on or before January 4, 2022. Thus, settlement payments will not be delayed by the Eric Defendants’ untimely execution of the Stipulation.

Page 2

As a result, Plaintiffs do not believe that the status conference scheduled for tomorrow morning is necessary and asks the Court to cancel the status conference. Plaintiffs thank the Court for its consideration of this matter and for retaining jurisdiction over the settlement.

Sincerely,



CHRISTOPHER MARLBOROUGH